

January 15, 1999

Dear Participants:

This is to announce a meeting of stakeholders who are interested in the applicability provisions of New Source Review (NSR) Reform, a preconstruction review permitting program under the Clean Air Act. The meeting will be held on February 2 - 3, 1999 at the J.W. Marriott Hotel (1331 Pennsylvania Avenue, Northwest) in Washington, D.C., beginning at 10:00 a.m., on Tuesday, February 2, and at 9:00 a.m., Wednesday, February 3, and ending no later than 12:00 noon on Wednesday, February 3.

The purpose of this meeting will be to discuss a new approach to NSR applicability. Attached is a 1-page outline of conceptual requirements and associated issues that have been suggested to date (Attachment 1). Interested stakeholders are invited to present, at this meeting, an approach for implementing the concept. We would also encourage presenters to include consideration of the questions (Attachment 2) that have been identified in internal Environmental Protection Agency (EPA) discussions.

The EPA is willing to pursue such an approach if it has promise. We will evaluate the approaches discussed by early March and decide whether we will sustain the effort on the new approach or resume work on the current final NSR Reform rulemaking package. In concert with this decision, we will also evaluate options for obtaining further stakeholder input.

Plans for how the meeting will be run are still under discussion within EPA. There is uncertainty as to how many attendees will be present, and there are constraints as to the size of the meeting room. Initial thoughts are that at the table, which will seat about 40-45 people, an equal number of seats will be made available to representatives from: (1) the industrial sector, (2) the public interest groups, (3) State and local governments, and (4) the Federal government. We do not anticipate that we will be able to provide more than one seat at the table for each industrial sector. There will be additional seating, theater style, in the meeting room, available on a first come first served basis, for about 50 people. To the extent possible, everyone who wishes to speak will have an opportunity.

An address list of persons who are being sent this letter is also attached (Attachment 3) and an announcement will be published in the Federal Register. It is also being placed on the Office of Air and Radiation's Internet website: (<http://www.epa.gov/oar/oarnew.html>) and the NSR website (http://www.epa.gov/ttn/nsr/rule_dev.html). If you know of someone who may not have received this letter but is interested in participating in such an effort, feel free to contact them.

Due to the unavailability of sleeping rooms at the J.W. Marriott, a block of rooms has been reserved at the Hotel Washington (515 15th Street, Northwest), which is a short distance away from the J.W. Marriott Hotel. The telephone number at the Hotel Washington is (202) 638-5900 and mention should be made of the EPA Clean Air Act meeting when reserving a room.

If you wish to attend the meeting, please E-mail or call Pam Smith, at E-mail address "smith.pam@epa.gov" or telephone number (919) 541-0641, by January 28. It would also be helpful if you indicate whether you plan to give a presentation. If you have further questions regarding the stakeholder meeting on February 2 - 3, you may call Dennis Crumpler at (919) 541-0871 or Karen Blanchard at (919) 541-5503.

Sincerely,

/s/

John S. Seitz
Director
Office of Air Quality Planning
and Standards

Attachments (3)

1. 1-Page Outline
2. Questions
3. Addressee List

A New Approach to NSR Applicability

The basic goal is to reduce emissions to a certain level, e.g., BACT or LAER, for existing sources that currently have no or little emission control at some fixed date in time, in the future. This would be done either through add-on technology or pollution prevention. Major greenfield sources would still be subject to current New Source Review (NSR) requirements. Netting as it is conducted today would be eliminated.

Criteria and issues based on preliminary discussions include:

- ◆ The test for applicability should be a **single** set of criteria that is easy to implement and enforce;
- ◆ Provide an exemption from many NSR modifications for a fixed period of time (e.g., 10 years from 1999). At the end of that period NSR, meaning the application of BACT or LAER, would apply to all major units at the source.
 - Some lead time would be provided for sources to install controls or retire the facility.
- ◆ NSR applicability as is currently conducted would be suspended with the following exceptions:
 - For modifications to existing units, EPA would at least continue to review reconstruction and major capacity expansions but examine the possibility of temporarily exempting lesser modifications from NSR;
 - BACT/LAER on all new emissions units and/or reconstruction and major capacity expansions would still be required.
- ◆ All non-NSR requirements of the Clean Air Act and implementation schedules for attaining health-based standards would remain unaffected by this new approach (e.g. SIP requirements, Title IV, MACT etc.).
- ◆ Other desirable outcomes are to:
 - Reduce the incidence of case-by-case BACT determinations--for example, establish presumptive BACT for specific industry sectors;
 - Factor improvements in efficiency improvements and pollution prevention into BACT/LAER decisions--for example, if large improvements are derived but the highest control levels are not achieved, should BACT/LAER be a function of air quality?
- ◆ Related Issues:

- What happens for sources in sectors that do not have a presumptive BACT established?
- How do we stimulate the development or evolution of more effective control technologies and P2?
- How would EPA and permitting authority deal with the possibility of hundreds of applications coming in on one date?
- How should reconstruction be defined for the purposes of NSR?

Questions

Questions for consideration in developing ideas for a new applicability approach are listed below:

1. Would grandfathering end on a fixed calendar date? How would EPA and the States verify evidence (via a permit) of compliance by the several thousand sources subject to the requirements as of a particular point in time? Would some other triggering mechanism be employed such as the expected life of the facility or oldest emissions units, or the first modification after a fixed date, or some combination of these?
2. If grandfathering were to end on a fixed date what would that date be?
3. What, exactly, triggers NSR at the end date? The mere reaching of that date, or some event at the source after the end date such as a physical modification?
4. What, exactly, is the obligation when NSR is eventually triggered? BACT or LAER depending on area attainment status? Could the fact that a unit installed BACT/LAER in the past influence the technology requirement, and if so, by how much?
5. Is a presumptive BACT/ LAER requirement feasible? What mechanisms can EPA use to ensure that control technologies and pollution prevention evolve? For example are there ways to get more submittals to the RACT/BACT/LAER Clearinghouse?
6. Is there a statutory basis for such an approach? Are there related issues that in order to resolve will lead to a test that is as complex as the existing one?
7. What other alternatives to this approach should be considered? These might include declining emission caps or other market-based approaches which set an area-wide, statewide, or regional emissions cap at a certain level at a certain point in time, while still guarding against local adverse impacts.
8. How does the new approach for NSR fit with efforts to encourage utilities to voluntarily increase efficiencies of generating electric power and engage in other carbon emission reduction efforts?
9. Can such an approach be supported by a sufficiently wide number of stakeholder groups to conclude that it has a significant chance for being promulgated in a reasonable time frame?

10. If there is widespread support for a new applicability test and EPA decides to move forward, how should the EPA handle some of the non-applicability issues addressed in the current NSR Reform rulemaking?
11. Should this approach be mandatory? Should it completely replace the current system or be a discretionary option?
12. What are the consequences, either positive or negative of ending netting?

NSR REFORM STAKEHOLDER MEMBERS

Attachment 3

Updated: 1/20/99

(**This listing is still being updated.**)

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